EXHIBIT B

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 2 of 21 PageID #: 1310 City of New York v. Old Dominion Tobacco Company, Inc., 20 Civ 5965 (ENV-RER) (E.D.N.Y.)

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	СС	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000006131		12/17/2020 10:32	12/17/2020 10:32		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Re: Cumberland County SO		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000006133		12/18/2020 12:36	12/18/2020 12:36		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Re: Atlantic Dominion		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000006147		12/22/2020 0:56	12/22/2020 0:56		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Re: Justic Freeman Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. It also includes discussion of Plaintiff's counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	
DMNL00241_ 000006151		12/27/2020 7:39	12/27/2020 7:39		.,,	Vin <vl.tpigroup@rocketmail.c om></vl.tpigroup@rocketmail.c 	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		Re: AD FINANCIALS		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000006156		1/3/2021 21:21	1/3/2021 21:21		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Re: Justic Freeman Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. It also includes discussion of Plaintiff's counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	
DMNL00241_ 000006159		1/5/2021 20:24	1/5/2021 20:24		Vin <vl.tpigroup@rock etmail.com></vl.tpigroup@rock 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			Comments from Tom on the interviews		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Cigarettes Unlimited, Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000006160		1/3/2021 19:00	1/3/2021 19:00		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Re: Justic Freeman Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. It also includes discussion of Plaintiff's counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	1	image0.png

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 3 of 21 PageID #: 1311

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	сс	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000006163		1/6/2021 21:21	1/6/2021 21:21		Vin Lesnak <vl.tpigroup@rock etmail.com></vl.tpigroup@rock 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			DIXIE		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000006166		1/9/2021 15:27	1/9/2021 15:27		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Re: December Invoice Wilmington Skyhawk Services LLC		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. It also includes discussion of Plaintiff's counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	
DMNL00241_ 000006176		1/12/2021 14:52	1/12/2021 14:52		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Re: invoice		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. It also includes irrelevant discussion of other investigative matters.	0	
DMNL00241_ 000006183		1/13/2021 13:13	1/13/2021 13:13		Vin Lesnak <vl.tpigroup@rock etmail.com></vl.tpigroup@rock 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Re: Teresa		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. It also includes discussion of Plaintiff's counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	
DMNL00241_ 000006187		1/17/2021 22:39	1/17/2021 22:39		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Jackpot!!		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion and FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000006252		2/7/2021 18:01	2/7/2021 18:01		Vin <vl.tpigroup@rock etmail.com></vl.tpigroup@rock 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>	Tpi Group <tpigroup@ro cketmail.com></tpigroup@ro 		Re: Relevant document samples from SW - lets discuss next steps in a call.		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited, Atlantic Dominion) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000006255		2/7/2021 15:32	2/7/2021 15:32		Tpi Group <tpigroup@rocket mail.com></tpigroup@rocket 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>	Vin Lesnak <vl.tpigroup@ rocketmail.co m></vl.tpigroup@ 		Re: Relevant document samples from SW - lets discuss next steps in a call.		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited, Atlantic Dominion) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 4 of 21 PageID #: 1312

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	сс	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000006277		5/2/2021 17:22	5/2/2021 17:22		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			Draft Summary of Interview of CI at Fayetteville		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC-2021-202- 04232021 - WitnessFJ.docx
DMNL00241_ 000006278		5/2/2021 17:22	5/2/2021 17:13	Frank Brostrom						WSSLLC- 2021-202- 04232021 - WitnessFJ.d ocx	Microsoft 2007 Word Document		Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000006309		2/24/2021 22:32	2/24/2021 22:32		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Fwd: Justic Freeman Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	FreeCoSummary001.docx
DMNL00241_ 000006311		2/24/2021 22:54	2/24/2021 22:54		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Re: Justic Freeman Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000006314		5/10/2021 0:16	5/10/2021 0:16		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			Re: Armstrong Grocery aka Surf Grocery Wholesale		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, Armstrong) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	ArmstrongSurfGrocery- 2021-202-05092021 - Adel Hageb.docx
DMNL00241_ 000006315		5/10/2021 0:16	5/10/2021 0:10	Frank Brostrom						ArmstrongS urfGrocery- 2021-202- 05092021 - Adel Hageb.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, Armstrong) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000006316		5/14/2021 0:03	5/14/2021 0:03		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>	"Lu, Hope (Law)" <hlu@law.nyc. gov></hlu@law.nyc. 		Atlantic Dominion - CI Debrief on 5/8/2021		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC-2021-202- 05082021 - WitnessFJ.docx
DMNL00241_ 000006317		5/14/2021 0:03	5/14/2021 0:00	Frank Brostrom						WSSLLC- 2021-202- 05082021 - WitnessFJ.d ocx	Microsoft 2007 Word Document		Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000006318		5/14/2021 0:08	5/14/2021 0:08		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			Edited first debrief of CI on 4/23/2021		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC-2021-202- 04232021 - WitnessFJ.docx
DMNL00241_ 000006319		5/14/2021 0:08	5/14/2021 0:07	Frank Brostrom						WSSLLC- 2021-202- 04232021 - WitnessFJ.d ocx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000006343		6/8/2021 13:17	6/8/2021 13:17		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			STEVEN CRAIG CRISS		Microsoft Outlook Note		Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC-2021-202- 06072021 - Steven Craig Criss.docx

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 5 of 21 PageID #: 1313

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	сс	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000006344		6/8/2021 13:17	6/8/2021 13:16	Frank Brostrom						WSSLLC- 2021-202- 06072021 - Steven Craig Criss.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000006347		6/5/2021 23:48	6/5/2021 23:48		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>	"Lu, Hope (Law)" <hlu@law.nyc. gov>; Mike Fitzpatrick <mike@fitzla wgreenville.co m></mike@fitzla </hlu@law.nyc. 		Atlantic Dominion photographs		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC-2021-202- 05242021 - AD Hope Mills.docx
DMNL00241_ 000006348		6/5/2021 23:48	6/5/2021 23:45	Frank Brostrom						WSSLLC- 2021-202- 05242021 - AD Hope Mills.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000006349		6/7/2021 22:56	6/7/2021 22:56		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			Brian Bullard and Richie Freeman Interviews		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	2	WSSLLC-2021-202- 06072021 - Larry R Freeman, Jr.docx; WSSLLC- 2021-202-06072021 - Brian Bullard.docx
DMNL00241_ 000006350		6/7/2021 22:56	6/7/2021 22:39	Frank Brostrom						WSSLLC- 2021-202- 06072021 - Larry R Freeman, Jr.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000006351		6/7/2021 22:56	6/7/2021 22:53	Frank Brostrom						WSSLLC- 2021-202- 06072021 - Brian Bullard.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000006376		3/25/2021 16:03	3/25/2021 16:03		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Re: Freeco		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. The email chain also includes Plaintiff's counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	
DMNL00241_ 000006378		4/3/2021 16:16	4/3/2021 16:16		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Re: Freeman's emails and spreadsheet		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. The email chain also includes Plaintiff's counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 6 of 21 PageID #: 1314

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	сс	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000006391		4/7/2021 8:26	4/7/2021 8:26		Vin <vl.tpigroup@rock etmail.com></vl.tpigroup@rock 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>	"Lu, Hope (Law)" <hlu@law.nyc. gov></hlu@law.nyc. 		Re: Altria Docs.		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000010028	NYC_000926 7	3/5/2021 11:10	2/24/2021 22:32		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Fwd: Justic Freeman Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. Plaintiff's counsel shared this communication and/or document with Sebastian Kielmanovich, a federal law enforcement official, in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	
DMNL00241_ 000010121		12/16/2020 23:39	12/16/2020 23:39		"proshansky, eric (law)"	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 			Re: Atlantic Dominion		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000010199		2/6/2021 10:50	2/6/2021 10:50		"proshansky, eric (law)"	"Vince Lesnak (vl.tpigroup@rocketmail.co m)" <vl.tpigroup@rocketmail.c om="">; tpigroup@rocketmail.com</vl.tpigroup@rocketmail.c>			CU Files		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000010204		2/7/2021 14:57	2/7/2021 14:57		"proshansky, eric (law)"	Tpi Group <tpigroup@rocketmail.co m></tpigroup@rocketmail.co 	Vin Lesnak <vl.tpigroup@ rocketmail.co m></vl.tpigroup@ 		Re: Relevant document samples from SW - lets discuss next steps in a call.		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited, Atlantic Dominion) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000010242		2/24/2021 22:48	2/24/2021 22:48		"proshansky, eric (law)"	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 			Re: Justic Freeman Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000010266	NYC_000955 9	3/5/2021 11:11	2/24/2021 22:32		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Fwd: Justic Freeman Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. Plaintiff's counsel shared this communication and/or document with Sebastian Kielmanovich, a federal law enforcement official, in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	
DMNL00241_ 000010294		3/26/2021 10:15	3/26/2021 10:15		"proshansky, eric (law)"	"Vince Lesnak (vl.tpigroup@rocketmail.co m)" «vl.tpigroup@rocketmail.c om>; Tpi Group <tpigroup@rocketmail.co m=""></tpigroup@rocketmail.co>			Jeff Smith III		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 7 of 21 PageID #: 1315

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	СС	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000010305	203	3/26/2021 10:24	3/26/2021 10:24		"proshansky, eric (law)"	Vin Lesnak <vl.tpigroup@rocketmail.c om>; Tpi Group <tpigroup@rocketmail.co m></tpigroup@rocketmail.co </vl.tpigroup@rocketmail.c 			RE: this may be our guy to talk to re AD		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000010315		4/6/2021 19:09	4/6/2021 19:09		"proshansky, eric (law)"	"Lu, Hope (Law)" <hlu@law.nyc.gov>; "Vince Lesnak (vl.tpigroup@rocketmail.co m)" <vl.tpigroup@rocketmail.c< td=""><td></td><td></td><td>Altria Docs.</td><td></td><td>Microsoft Outlook Note</td><td>AWP</td><td>Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.</td><td>0</td><td></td></vl.tpigroup@rocketmail.c<></hlu@law.nyc.gov>			Altria Docs.		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000010360		6/13/2021 16:42	6/13/2021 16:42		"proshansky, eric (law)"	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>			[No Subject]		Microsoft Outlook Note	ACC	Communication between Plaintiff's counsel regarding this litigation.	5	STEVEN CRAIG CRISS; WSSLLC-2021-202- 06072021 - Steven Craig Criss.docx; Brian Bullard and Richie Freeman Interviews; WSSLLC-2021- 202-06072021 - Larry R Freeman, Jr.docx; WSSLLC- 2021-202-06072021 - Brian Bullard.docx
DMNL00241_ 000010361		6/13/2021 16:42	6/8/2021 13:17		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			STEVEN CRAIG CRISS		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000010362		6/13/2021 16:42	6/8/2021 13:16	Frank Brostrom						WSSLLC- 2021-202- 06072021 - Steven Craig Criss.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000010363		6/13/2021 16:42	6/7/2021 22:56		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			Brian Bullard and Richie Freeman Interviews		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000010364		6/13/2021 16:42	6/7/2021 22:39	Frank Brostrom						WSSLLC- 2021-202- 06072021 - Larry R Freeman, Jr.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000010365		6/13/2021 16:42	6/7/2021 22:53	Frank Brostrom						WSSLLC- 2021-202- 06072021 - Brian Bullard.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000012366		2/7/2021 15:35	2/7/2021 15:35		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=excha nge administrative group (fydibohf23spdlt)/ cn=recipients/cn= eproshan">	Tpi Group <tpigroup@rocketmail.co m></tpigroup@rocketmail.co 	Vin Lesnak <vl.tpigroup@ rocketmail.co m></vl.tpigroup@ 		RE: Relevant document samples from SW lets discuss next steps in a call.		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited, Atlantic Dominion) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 8 of 21 PageID #: 1316 City of New York v. Old Dominion Tobacco Company, Inc., 20 Civ 5965 (ENV-RER) (E.D.N.Y.)

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	сс	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000012417	NYC_000968 5	3/5/2021 11:11	2/24/2021 22:32		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Fwd: Justic Freeman Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. Plaintiff's counsel shared this communication and/or document with Sebastian Kielmanovich, a federal law enforcement official, in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	
DMNL00241_ 000012465		3/26/2021 10:12	3/26/2021 10:12		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=excha nge administrative group (fydibohf23spdlt)/ cn=recipients/cn= eproshan">	"Vince Lesnak (vl.tpigroup@rocketmail.co m)" <vl.tpigroup@rocketmail.c om="">; Tpi Group <tpigroup@rocketmail.co m=""></tpigroup@rocketmail.co></vl.tpigroup@rocketmail.c>			this may be our guy to talk to re AD		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000012484		6/13/2021 16:42	6/13/2021 16:42		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=excha nge administrative group (fydibohf23spdlt)/ cn=recipients/cn= eproshan">	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>			[No Subject]		Microsoft Outlook Note	ACC	Communication between Plaintiff's counsel regarding this litigation.	5	STEVEN CRAIG CRISS; WSSLLC-2021-202- 06072021 - Steven Craig Criss.docx; Brian Bullard and Richie Freeman Interviews; WSSLLC-2021- 202-06072021 - Larry R Freeman, Jr.docx; WSSLLC- 2021-202-06072021 - Brian Bullard.docx
DMNL00241_ 000012485		6/13/2021 16:42	6/8/2021 13:17		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			STEVEN CRAIG CRISS		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000012486		6/13/2021 16:42	6/8/2021 13:16	Frank Brostrom						WSSLLC- 2021-202- 06072021 - Steven Craig Criss.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000012487		6/13/2021 16:42	6/7/2021 22:56		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			Brian Bullard and Richie Freeman Interviews		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000012488		6/13/2021 16:42	6/7/2021 22:39	Frank Brostrom						WSSLLC- 2021-202- 06072021 - Larry R Freeman, Jr.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000012489		6/13/2021 16:42	6/7/2021 22:53	Frank Brostrom						WSSLLC- 2021-202- 06072021 - Brian Bullard.docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 9 of 21 PageID #: 1317 City of New York v. Old Dominion Tobacco Company, Inc., 20 Civ 5965 (ENV-RER) (E.D.N.Y.)

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	сс	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000012702		2/6/2021 12:00	2/6/2021 12:00		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=excha nge administrative group (fydibohf23spdlt)/ cn=recipients/cn= eproshan">	Tpi Group <tpigroup@rocketmail.co m></tpigroup@rocketmail.co 	"Vince Lesnak (vl.tpigroup@r ocketmail.com)" <vl.tpigroup@ rocketmail.co m></vl.tpigroup@ 		RE: CU Files		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000012735	NYC_000977 2	3/5/2021 11:10	2/24/2021 22:32		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Fwd: Justic Freeman Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. Plaintiff's counsel shared this communication and/or document with Sebastian Kielmanovich, a federal law enforcement official, in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	
DMNL00241_ 000012820		10/23/2020 11:01	10/23/2020 11:01		group (fydibohf23spdlt)/	"Vince Lesnak (vl.tpigroup@rocketmail.co m)" <vl.tpigroup@rocketmail.c om></vl.tpigroup@rocketmail.c 			FW: List of Stores		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Bonnie's Bounty, Cigarettes Unlimited, Village Tobacco) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000012879		1/5/2021 20:44	1/5/2021 20:44		nge administrative group	Vin <vl.tpigroup@rocketmail.c om></vl.tpigroup@rocketmail.c 	"Lu, Hope (Law)" <hlu@law.nyc. gov></hlu@law.nyc. 		Re: Comments from Tom on the interviews		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited, Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000012896		1/17/2021 22:54	1/17/2021 22:54		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=excha nge administrative group (fydibohf23spdlt)/ cn=recipients/cn= eproshan">	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 			Re: Jackpot!!		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion and FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000012897		1/18/2021 11:47	1/18/2021 11:47		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=excha nge administrative group (fydibohf23spdlt)/ cn=recipients/cn= eproshan">	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 			RE: Atlantic Dominion Case		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion and FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 10 of 21 PageID #: 1318 City of New York v. Old Dominion Tobacco Company, Inc., 20 Civ 5965 (ENV-RER) (E.D.N.Y.)

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	сс	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000012899		1/18/2021 13:10	1/18/2021 13:10		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=excha nge administrative group (fydibohf23spdlt)/ cn=recipients/cn= eproshan">	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 			RE: Highlights of the Biggest Cases under Altria Contract		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion and FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. It also includes discussion of Plaintiff's counsel's communications with Sebastian Kielmanovich, a federal law enforcement official, regarding a criminal investigation in North Carolina. Those communications were in furtherance of the common interest in the prosecution of cigarette trafficking shared by federal law enforcement and Plaintiff.	0	
DMNL00241_ 000012900		1/18/2021 15:44	1/18/2021 15:44		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=excha nge administrative group (fydibohf23spdlt)/ cn=recipients/cn= eproshan">	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 			Re: Highlights of the Biggest Cases under Altria Contract		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013144		9/1/2021 9:03	9/1/2021 9:03		"/o=exchangelabs /ou=exchange administrative group (fydibohf23spdlt)/ cn=recipients/cn= 67422df4e9934c3 b8884f3506eaf22 d7-proshansky,"	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 			RE: Atlantic Dominion		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013191		9/1/2021 9:11	9/1/2021 9:11		"/o=exchangelabs /ou=exchange administrative group (fydibohf23spdlt)/ cn=recipients/cn= 67422df4e9934c3 b8884f3506eaf22 d7-proshansky,"	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 			RE: Justic Freeman Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013208		4/11/2021 13:54	4/11/2021 13:54		eproshan@law.ny c.gov	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 	"Lu, Hope (Law)" <hlu@law.nyc. gov></hlu@law.nyc. 		Re: FreeCoSummary0 01.docx		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013220		4/24/2021 10:49	4/24/2021 10:49		eproshan@law.ny c.gov	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 			Re: Shareef Hasan		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. Also includes irrelevant discussion of other investigative matters.	0	
DMNL00241_ 000013225		5/2/2021 18:42	5/2/2021 18:42		eproshan@law.ny c.gov	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 			Re: Draft Summary of Interview of CI at Fayetteville		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 11 of 21 PageID #: 1319 City of New York v. Old Dominion Tobacco Company, Inc., 20 Civ 5965 (ENV-RER) (E.D.N.Y.)

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	сс	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000013289		4/13/2021 15:13	4/13/2021 15:13		group	Frank Brostrom <frank.brostrom@gmail.co m>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></frank.brostrom@gmail.co 			RE: AD		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013304		7/14/2021 13:23	7/14/2021 13:23		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=excha nge administrative group (fydibohf23spdlt)/ cn=recipients/cn= eproshan">	Vin Lesnak <vl.tpigroup@rocketmail.c om></vl.tpigroup@rocketmail.c 	"Lu, Hope (Law)" <hlu@law.nyc. gov></hlu@law.nyc. 		RE: Altria Second Response Re: NYC RFI Dated February 3, 2021		Microsoft Outlook Note	AWP	Communication regarding this litigation (related to factual investigation of Atlantic Dominion) between Plaintiff's counsel and Vincent Lesnak, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013321		4/19/2021 16:51	4/19/2021 16:51		group	Frank Brostrom <frank.brostrom@gmail.co m>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></frank.brostrom@gmail.co 			RE: Freeman Interview		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013325		7/19/2021 23:08	7/19/2021 23:08		eproshan@law.ny c.gov	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 	"Lu, Hope (Law)" <hlu@law.nyc. gov></hlu@law.nyc. 		Re: Bullard Interview RE Charles		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013336		4/24/2021 8:56	4/24/2021 8:56		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=excha nge administrative group (fydibohf23spdlt)/ cn=recipients/cn= eproshan">	<pre><frank.brostrom@gmail.co m=""></frank.brostrom@gmail.co></pre>			Re: Shareef Hasan		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. Also includes irrelevant discussion of other investigative matters.	0	
DMNL00241_ 000013458		5/2/2021 12:11	5/2/2021 12:11		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=excha nge administrative group (fydibohf23spdlt)/ cn=recipients/cn= eproshan">	Tpi Group <tpigroup@rocketmail.co m></tpigroup@rocketmail.co 	Vin <vl.tpigroup@ rocketmail.co m></vl.tpigroup@ 		Re:		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013471		5/2/2021 12:42	5/2/2021 12:42		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=excha nge administrative group (fydibohf23spdlt)/ cn=recipients/cn= eproshan">	Tpi Group <tpigroup@rocketmail.co m></tpigroup@rocketmail.co 	Vin <vl.tpigroup@ rocketmail.co m></vl.tpigroup@ 		RE:		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 12 of 21 PageID #: 1320 City of New York v. Old Dominion Tobacco Company, Inc., 20 City 5965 (ENV-RER) (E.D.N.Y.)

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	СС	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000013480		11/3/2021 13:28	11/3/2021 13:28		"Proshansky, Eric (Law)" <"/o=exchangelab s/ou=exchange administrative group (fydibohf23spdlt)/ cn=recipients/cn= 67422df4e9934c3 b8884f3506eaf22 d7-proshansky,">	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 			RE: [EXTERNAL] Fwd: Justin Freeman		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013496		5/3/2021 7:21	5/3/2021 7:21		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=excha nge administrative group (fydibohf23spdlt)/ cn=recipients/cn= eproshan">	m>	"Lu, Hope (Law)" <hlu@law.nyc. gov></hlu@law.nyc. 		Re: Suggested Search Criteria via MFiles		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013540		2/1/2022 22:16	2/1/2022 22:16		"Proshansky, Eric (Law)" <"/o-exchangelab s/ou-exchange administrative group (fydibohf23spdlt)/cn=recipients/cn=67422df4e9934c3 ba884f3506eaf22 d7-proshansky,">	Frank Brostrom <frank.brostrom@gmail.co m>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></frank.brostrom@gmail.co 			Re: [EXTERNAL] Justin Freeman		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013572		5/10/2021 8:05	5/10/2021 8:05		eproshan@law.ny c.gov	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 	"Lu, Hope (Law)" <hlu@law.nyc. gov></hlu@law.nyc. 		Re: Armstrong Grocery aka Surf Grocery Wholesale		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, Armstrong) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013578		5/10/2021 11:06	5/10/2021 11:06		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=excha nge administrative group (fydibohf23spdlt)/ cn=recipients/cn= eproshan">	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 	"Lu, Hope (Law)" <hlu@law.nyc. gov></hlu@law.nyc. 		RE: Armstrong Grocery aka Surf Grocery Wholesale		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, Armstrong, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013587		5/13/2021 13:48	5/13/2021 13:48		"Proshansky, Eric (Law)" <"/o=cs hosting/ou=excha nge administrative group (fydibohf23spdlt)/ cn=recipients/cn= eproshan">	Tpi Group <tpigroup@rocketmail.co m></tpigroup@rocketmail.co 	"Vince Lesnak (vl.tpigroup@r ocketmail.com)" <vl.tpigroup@ rocketmail.co m>; "Lu, Hope (Law)" <hlu@law.nyc. gov></hlu@law.nyc. </vl.tpigroup@ 		RE: Highlights of call with Riley and his attorney Alex		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 13 of 21 PageID #: 1321 City of New York v. Old Dominion Tobacco Company, Inc., 20 Civ 5965 (ENV-RER) (E.D.N.Y.)

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	СС	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000013770	oug	4/11/2021 13:43	4/11/2021 13:43		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			FreeCoSummary0 01.docx		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	2	FreeCoSummary001.docx; ATT00001.txt
DMNL00241_ 000013798		4/11/2021 15:11	4/11/2021 15:11		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			Some preliminary questions from the Intel Reports.		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Justin Freeman Interview Questions.docx
DMNL00241_ 000013799		4/11/2021 15:11	4/11/2021 15:09	Frank Brostrom						Justin Freeman Interview Questions.d ocx	Microsoft 2007 Word Document	AWP	Document (draft interview questions) related to this litigation (related to factual investigation of FreeCo, Atlantic Dominion) prepared and/or provided by Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013816		4/12/2021 10:21	4/12/2021 10:21		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			Updated Interview Questions		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Justin Freeman Interview Questions.docx
DMNL00241_ 000013817		4/12/2021 10:21	4/12/2021 10:18	Frank Brostrom						Justin Freeman Interview Questions.d ocx	Microsoft 2007 Word Document	AWP	Document (draft interview questions) related to this litigation (related to factual investigation of FreeCo, Atlantic Dominion) prepared and/or provided by Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013823		4/12/2021 23:54	4/12/2021 23:54		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			Freeman Interview		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Justin Freeman Interview04122021.docx
DMNL00241_ 000013824		4/12/2021 23:54	4/12/2021 23:52	Frank Brostrom						Justin Freeman Interview04 122021.doc x		AWP	Document (interview notes) related to this litigation (related to factual investigation of FreeCo, Atlantic Dominion) prepared and/or provided by Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013833		4/18/2021 8:27	4/18/2021 8:27		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m>; "Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov></frank.brostrom@gmail.co 			RE: Freeman Interview		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Justin Freeman Interview04122021 w Law_s comments - (# Legal 11693848).DOCX
DMNL00241_ 000013834		4/18/2021 8:27	4/18/2021 8:22	Frank Brostrom						Justin Freeman Interview04 122021 w Law_s comments - (# Legal 11693848). DOCX	Microsoft 2007 Word Document	AWP	Document (interview notes) related to this litigation (related to factual investigation of FreeCo, Atlantic Dominion) prepared and/or provided by Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. Also includes notes and work product of Plaintiff's counsel.	0	
DMNL00241_ 000013840		4/19/2021 17:49	4/19/2021 17:49		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		RE: Freeman Interview		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 14 of 21 PageID #: 1322 City of New York v. Old Dominion Tobacco Company, Inc., 20 Civ 5965 (ENV-RER) (E.D.N.Y.)

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	сс	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000013845		4/24/2021 8:35	4/24/2021 8:35		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Re: Shareef Hasan		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. Also includes irrelevant discussion of other investigative matters.	0	
DMNL00241_ 000013847		4/27/2021 9:54	4/27/2021 9:54		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m>; "Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov></frank.brostrom@gmail.co 			RE: Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013850		4/27/2021 18:36	4/27/2021 18:36		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		RE: Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Justin Freeman Interview04122021 w Law_s comments - (# Legal 11693848).DOCX
DMNL00241_ 000013851		4/27/2021 18:36	4/27/2021 18:35	Frank Brostrom						Justin Freeman Interview04 122021 w Law_s comments - (# Legal 11693848). DOCX	Microsoft 2007 Word Document	AWP	Document (interview notes) related to this litigation (related to factual investigation of FreeCo, Atlantic Dominion) prepared and/or provided by Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation. Incorporates attorney work product from Plaintiff's Counsel.	0	
DMNL00241_ 000013853		4/27/2021 19:22	4/27/2021 19:22		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		Re: Summary		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013858		5/2/2021 11:19	5/2/2021 11:19		Tpi Group <tpigroup@rocket mail.com></tpigroup@rocket 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>	"Vince Lesnak (vl.tpigroup@r ocketmail.com)" <vl.tpigroup@ rocketmail.co m></vl.tpigroup@ 		Re: Re:		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013859		5/2/2021 11:48	5/2/2021 11:48		Vin <vl.tpigroup@rock etmail.com></vl.tpigroup@rock 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>	Tpi Group <tpigroup@ro cketmail.com></tpigroup@ro 		Re:		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013861		5/2/2021 12:34	5/2/2021 12:34		Tpi Group <tpigroup@rocket mail.com></tpigroup@rocket 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>	Vin <vl.tpigroup@ rocketmail.co m></vl.tpigroup@ 		Re:		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Cigarettes Unlimited) between Plaintiff's counsel, Vincent Lesnak, and Tom Lesnak, both of whom are investigators engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013867		5/2/2021 23:31	5/2/2021 23:31		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Re: Draft Summary of Interview of CI at Fayetteville		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 15 of 21 PageID #: 1323 City of New York v. Old Dominion Tobacco Company, Inc., 20 Civ 5965 (ENV-RER) (E.D.N.Y.)

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	сс	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000013868	==6	5/2/2021 23:25	5/2/2021 23:25		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		Re: Draft Summary of Interview of CI at Fayetteville		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013875		5/3/2021 9:20	5/3/2021 9:20		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m>; "Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov></frank.brostrom@gmail.co 			RE: Suggested Search Criteria via MFiles		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013890		5/5/2021 14:01	5/5/2021 14:01		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		RE: Draft Summary of Interview of CI at Fayetteville		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013891		5/6/2021 17:50	5/6/2021 17:50		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m>; "Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov></frank.brostrom@gmail.co 			RE: EIS Report ATF 042619.docx		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013906		5/10/2021 9:55	5/10/2021 9:55		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Re: Armstrong Grocery aka Surf Grocery Wholesale		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, Armstrong) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013915		5/14/2021 0:05	5/14/2021 0:05		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m>; "Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov></frank.brostrom@gmail.co 			RE: Atlantic Dominion - CI Debrief on 5/8/2021		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013917		5/14/2021 15:01	5/14/2021 15:01		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Re: Edited first debrief of CI on 4/23/2021		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013922		5/24/2021 8:49	5/24/2021 8:49		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		Jennifer		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013923		5/24/2021 11:29	5/24/2021 11:29		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		Re: Jennifer		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013924		5/24/2021 12:37	5/24/2021 12:37		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		Privileged communication re Atlantic Dominion		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Salkeld Declaration - 5-24- 2021 - (# Legal 11795813).DOCX

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 16 of 21 PageID #: 1324 City of New York v. Old Dominion Tobacco Company, Inc., 20 Civ 5965 (ENV-RER) (E.D.N.Y.)

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	сс	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000013925		5/24/2021 12:37	5/24/2021 12:33	eproshan						Salkeld Declaration 5-24-2021 - (# Legal 11795813). DOCX	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0	
DMNL00241_ 000013927		5/24/2021 14:22	5/24/2021 14:22		, , , ,	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		RE: Privileged communication re Atlantic Dominion		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Salkeld Declaration - 5-24- 2021 - final - (# Legal 11796654).docx
DMNL00241_ 000013928		5/24/2021 14:22	5/24/2021 14:20	eproshan						Salkeld Declaration 5-24-2021 - final - (# Legal 11796654). docx	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0	
DMNL00241_ 000013929		5/24/2021 13:02	5/24/2021 13:02		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		RE: Privileged communication re Atlantic Dominion		Microsoft Outlook Note	AWP		1	Updated Salkeld Declaration - 5-24-2021 - (# Legal 11795813).DOCX
DMNL00241_ 000013930		5/24/2021 13:02	5/24/2021 12:58	eproshan						Updated Salkeld Declaration 5-24-2021 - (# Legal 11795813). DOCX	-Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0	
DMNL00241_ 000013938		5/26/2021 10:10	5/26/2021 10:10		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>	"Lu, Hope (Law)" <hlu@law.nyc. gov></hlu@law.nyc. 		Re: Salkeld Declaration		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013949		6/4/2021 11:41	6/4/2021 11:41			Frank Brostrom <frank.brostrom@gmail.co m>; "Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov></frank.brostrom@gmail.co 			Freeman (confidential and privileged)		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Freeman Declaration (AD) - draft - 6-4-2021 - (# Legal 11829540).DOCX
DMNL00241_ 000013950		6/4/2021 11:41	6/4/2021 11:40	eproshan						Freeman Declaration (AD) - draft 6-4-2021 - (# Legal 11829540). DOCX	- Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0	
DMNL00241_ 000013951		6/4/2021 13:45	6/4/2021 13:45		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		Re: Freeman (confidential and privileged)		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013952		6/4/2021 13:41	6/4/2021 13:41		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		Re: Freeman (confidential and privileged)		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 17 of 21 PageID #: 1325 City of New York v. Old Dominion Tobacco Company, Inc., 20 Civ 5965 (ENV-RER) (E.D.N.Y.)

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	сс	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000013955		7/6/2021 10:26	7/6/2021 10:26		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m>; "Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov></frank.brostrom@gmail.co 			Atlantic Dominion - FJ [confidential/privil eged]		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	2	Salkeld Declaration - 7-6- 2021 - CLEAN.docx; Salkeld Declaration - 7-6- 2021 - REDLINE.docx
DMNL00241_ 000013956		7/6/2021 10:26	7/6/2021 10:05	eproshan						Salkeld Declaration 7-6-2021 - CLEAN.docx	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0	
DMNL00241_ 000013957		7/6/2021 10:26	7/6/2021 10:20	eproshan						Salkeld Declaration 7-6-2021 - REDLINE.do cx	-Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0	
DMNL00241_ 000013958		7/6/2021 11:53	7/6/2021 11:53		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; Frank Brostrom <frank.brostrom@gmail.co m=""></frank.brostrom@gmail.co></eproshan@law.nyc.gov>			Atlantic Dominion - Freeman (confidential/privil eged)		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Atlantic Dominion - Freeman Declaration - 7-6- 2021.docx
DMNL00241_ 000013959		7/6/2021 11:53	7/6/2021 11:52	eproshan						Atlantic Dominion - Freeman Declaration 7-6- 2021.docx	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0	
DMNL00241_ 000013963		7/6/2021 20:21	7/6/2021 20:21		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m="">; "Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov></frank.brostrom@gmail.co>			RE: Atlantic Dominion - FJ [confidential/privil eged]	I	Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Salkeld Declaration - 7-6- 2021 - CLEAN.docx
DMNL00241_ 000013964		7/6/2021 20:21	7/6/2021 10:05	eproshan						Salkeld Declaration 7-6-2021 - CLEAN.docx	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0	
DMNL00241_ 000013965		7/7/2021 9:28	7/7/2021 9:28		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		RE: Atlantic Dominion - FJ [confidential/privil eged]	I	Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000013970		7/12/2021 7:17	7/12/2021 7:17		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		Atlantic Dominion [confidential/privil eged]		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	3	Brian Bullard Declaration - 7-12-2021.docx; Larry %22Richie%22 Freeman Declaration - 7-12- 2021.docx; Salkeld Declaration - 7-12-2021 .docx
DMNL00241_ 000013971		7/12/2021 7:17	7/11/2021 23:00	eproshan						Brian Bullard Declaration 7-12- 2021.docx	Microsoft -2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel.	0	

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 18 of 21 PageID #: 1326

City of New York's Privilege Log (Withheld Documents), Revised 06/13/2023

Control Production Privilege Attachment **Parent Date Document Date** Author From To CC всс Subject File Name File Type **Privilege Log Description Attachment Names** Number Begin Type Count Larry %22Richie9 Microsoft DMNL00241 22 Freemar Draft of document for filing in this litigation prepared by 7/12/2021 7:17 7/11/2021 22:58 2007 Word AWP eproshan Plaintiff's counsel. 000013972 Declaration Document 7-12-2021.docx Salkeld Microsoft DMNL00241 Declaration Draft of document for filing in this litigation prepared by 7/12/2021 7:17 7/11/2021 22:55 2007 Word AWP eproshan 000013973 7-12-2021 Plaintiff's counsel. Document .docx Communication (email chain) regarding this litigation "Proshansky RE: Atlantic (related to factual investigation of FreeCo, Atlantic "Lu, Hope (Law)" Frank Brostrom Microsoft DMNL00241 Eric (Law)" Dominion Dominion) between Plaintiff's counsel and Frank Brostrom, 7/12/2021 9:26 7/12/2021 9:26 <hlu@law.nyc.gov <frank.brostrom@gmail.co Outlook AWP 000013974 <eproshan@la confidential/privil an investigator engaged by Plaintiff to perform Note w.nyc.gov> egedl investigative tasks in connection with this and other litigation. Communication regarding this litigation (related to factual Re: Altria Second Lu, Hope Vin Lesnak Microsoft investigation of Atlantic Dominion) between Plaintiff's DMNL00241 "Proshansky, Eric (Law)" Response Re: NYC (Law) 7/14/2021 13:06 7/14/2021 13:06 <vl.tpigroup@roc Outlook counsel and Vincent Lesnak, an investigator engaged by 000013986 <eproshan@law.nyc.gov> <hlu@law.nyc RFI Dated etmail.com> Note Plaintiff to perform investigative tasks in connection with February 3, 2021 zov> this and other litigation. Communication (email chain) regarding this litigation Frank Brostrom (related to factual investigation of FreeCo. Atlantic "Lu, Hope (Law)" <frank.brostrom@gmail.co</pre> Microsoft Dominion) between Plaintiff's counsel and Frank Brostrom, DMNL00241 7/19/2021 9:36 7/19/2021 9:36 <hlu@law.nyc.gov m>; "Proshansky, Eric RE: Declarations Outlook 000014160 an investigator engaged by Plaintiff to perform (Law)" Note investigative tasks in connection with this and other <eproshan@law.nyc.gov> litigation. Communication (email chain) regarding this litigation Frank Brostrom (related to factual investigation of FreeCo, Atlantic "Lu, Hope (Law)" <frank.brostrom@gmail.co</pre> RE: Bullard Microsoft DMNL00241 Dominion) between Plaintiff's counsel and Frank Brostrom, 7/19/2021 23:06 7/19/2021 23:06 <hlu@law.nyc.gov m>; "Proshansky, Eric Interview RE Outlook AWP 000014161 an investigator engaged by Plaintiff to perform (Law)" Charles Note investigative tasks in connection with this and other <eproshan@law.nyc.gov> litigation. Communication (email) regarding this litigation (related to "Proshansky, Eric (Law)" WSSLLC-2021-202-Frank Brostrom Microsoft factual investigation of FreeCo, Atlantic Dominion) DMNL00241 <epre><epre>ceproshan@law.nyc.gov> **Bullard Interview** 07182021 - Brian 7/19/2021 22:59 7/19/2021 22:59 <frank.brostrom@ Outlook between Plaintiff's counsel and Frank Brostrom, an RE Charles 000014166 "Lu, Hope (Law)" Bullard.docx gmail com> investigator engaged by Plaintiff to perform investigative Note <hlu@law.nyc.gov> tasks in connection with this and other litigation. WSSLLCinvestigative report (related to factual investigation of 2021-202-Microsoft Atlantic Dominion, FreeCo) drafted for purposes of this DMNL00241 Frank 7/19/2021 22:56 07182021 2007 Word 7/19/2021 22:59 AWP litigation by Frank Brostrom, an investigator hired by 000014167 Brostrom Brian Document Plaintiff to perform investigative tasks in connection with Bullard.doc this and other litigation. Communication (email) regarding this litigation (related to "Proshansky, Eric (Law)" factual investigation of FreeCo, Armstrong, Atlantic Frank Brostrom Microsoft Atlantic Dominion -DMNL00241 <eproshan@law.nyc.gov> Declaration for Dominion) between Plaintiff's counsel and Frank Brostrom, 7/30/2021 23:21 7/30/2021 23:21 <frank.brostrom@ Outlook AWP Herring Declaration - 7-30-000014190 Charles Herring "Lu, Hope (Law)" an investigator engaged by Plaintiff to perform gmail.com> Note 2021 Final.docx <hlu@law.nyc.gov> investigative tasks in connection with this and other Atlantic Dominion Draft of document for filing in this litigation prepared by Microsoft DMNL00241 Plaintiff's counsel and Frank Brostrom, an investigator Herring 7/30/2021 23:21 2007 Word AWP 7/30/2021 23:18 eproshan 000014191 engaged by Plaintiff to perform investigative tasks in Declaration Document 7-30-2021 connection with this and other litigation.

Final.doc

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 19 of 21 PageID #: 1327

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	СС	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000014192	oug	7/30/2021 23:53	7/30/2021 23:53		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>	Frank Brostrom <frank.brostro m@gmail.com ></frank.brostro 		Re: Declaration for Charles Herring		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014194		7/31/2021 12:48	7/31/2021 12:48		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			Updated Declaration 7/31/21 12:47 pm		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Atlantic Dominion - Herring Declaration - 7-30- 2021 Final.docx
DMNL00241_ 000014195		7/31/2021 12:48	7/31/2021 12:46	eproshan						Atlantic Dominion - Herring Declaration 7-30-2021 Final.docx	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014196		7/31/2021 20:45	7/31/2021 20:45			Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		Atlantic Dominion - CH		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Atlantic Dominion - Herring Declaration - 7-30- 2021 FINAL CLEAN.docx
DMNL00241_ 000014197		7/31/2021 20:45	7/31/2021 20:37	eproshan						Atlantic Dominion - Herring Declaration 7-30-2021 FINAL CLEAN.docx	Microsoft -2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014199		8/1/2021 9:16	8/1/2021 9:16		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			Re: Atlantic Dominion - CH		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014200		8/1/2021 3:33	8/1/2021 3:33		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			Full Report and Details		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC-2021-202- 07302021 - Charles Herring .docx
DMNL00241_ 000014201		8/1/2021 3:33	8/1/2021 3:27	Frank Brostrom						WSSLLC- 2021-202- 07302021 - Charles Herring .docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo, Armstrong) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014202		8/1/2021 9:30	8/1/2021 9:30		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>	Frank Brostrom <frank.brostro m@gmail.com ></frank.brostro 		Final Dec Herring		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Atlantic Dominion - Herring Declaration - 8-01- 2021 FINAL.docx
DMNL00241_ 000014203		8/1/2021 9:30	8/1/2021 9:29	eproshan						Atlantic Dominion - Herring Declaration 8-01-2021 FINAL.docx	Microsoft 2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 20 of 21 PageID #: 1328 City of New York v. Old Dominion Tobacco Company, Inc., 20 Civ 5965 (ENV-RER) (E.D.N.Y.)

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	сс	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000014204		8/2/2021 9:46	8/2/2021 9:46		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co </eproshan@law.nyc.gov>			RE: Herring Declaration		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014205		8/2/2021 17:03	8/2/2021 17:03		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		Re: Herring Declaration		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014208		8/3/2021 16:15	8/3/2021 16:15		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m></frank.brostrom@gmail.co 	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		Atlantic Dominion - CH		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	Atlantic Dominion - Herring Declaration - 8-3- 2021 FINAL with typos corrected REDLINE.docx
DMNL00241_ 000014209		8/3/2021 16:15	8/3/2021 11:46	eproshan						Atlantic Dominion - Herring Declaration 8-3-2021 FINAL with typos corrected REDLINE.do cx	2007 Word Document	AWP	Draft of document for filing in this litigation prepared by Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014224		8/4/2021 23:58	8/4/2021 23:58		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			Herring Detailed Report edited - final		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC-2021-202- 07302021 - Charles Herring .docx
DMNL00241_ 000014225		8/4/2021 23:58	8/4/2021 23:47	Frank Brostrom						WSSLLC- 2021-202- 07302021 - Charles Herring .docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo, Armstrong) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014226		8/5/2021 0:49	8/5/2021 0:49		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			Follow up telcall with Witness Charles Herring on 8/4/2021		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Armstrong, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	1	WSSLLC-2021-202- 08042021 - Charles Herring002 .docx
DMNL00241_ 000014227		8/5/2021 0:49	8/5/2021 0:46	Frank Brostrom						WSSLLC- 2021-202- 08042021 - Charles Herring002 .docx	Microsoft 2007 Word Document	AWP	Investigative report (related to factual investigation of Atlantic Dominion, FreeCo) drafted for purposes of this litigation by Frank Brostrom, an investigator hired by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014232		8/5/2021 11:41	8/5/2021 11:41		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov>	"Proshansky, Eric (Law)" <eproshan@la w.nyc.gov></eproshan@la 		[EXTERNAL] Re: Herring Detailed Report edited - final		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, Armstrong, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	

Case 2:20-cv-05965-ENV-RER Document 71-2 Filed 07/07/23 Page 21 of 21 PageID #: 1329 City of New York v. Old Dominion Tobacco Company, Inc., 20 Civ 5965 (ENV-RER) (E.D.N.Y.)

Control Number	Production Begin	Parent Date	Document Date	Author	From	То	сс	всс	Subject	File Name	File Type	Privilege Type	Privilege Log Description	Attachment Count	Attachment Names
DMNL00241_ 000014236		8/10/2021 22:00	8/10/2021 22:00		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			[EXTERNAL] proposed consensual recorded telephone call		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of Atlantic Dominion, Armstrong, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014237		8/10/2021 23:09	8/10/2021 23:09		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov>; "Lu, Hope (Law)" <hlu@law.nyc.gov></hlu@law.nyc.gov></eproshan@law.nyc.gov>			[EXTERNAL] Re: proposed consensual recorded telephone call		Microsoft Outlook Note		Communication (email chain) regarding this litigation (related to factual investigation of Atlantic Dominion, Armstrong, FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014275		10/8/2021 10:01	10/8/2021 10:01		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			Re: [EXTERNAL] Checking in		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014309		11/2/2021 10:39	11/2/2021 10:39		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m>; "Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov></frank.brostrom@gmail.co 			Justin Freeman		Microsoft Outlook Note	AWP	Communication (email) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014311		11/3/2021 15:47	11/3/2021 15:47		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>	"Lu, Hope (Law)" <hlu@law.nyc. gov></hlu@law.nyc. 		Re: [EXTERNAL] Re: Justin Freeman		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014312		11/3/2021 12:49	11/3/2021 12:49		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	"Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov>			[EXTERNAL] Fwd: Justin Freeman		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014317		11/18/2021 17:24	11/18/2021 17:24		Frank Brostrom <frank.brostrom@ gmail.com></frank.brostrom@ 	,, , ,	"Lu, Hope (Law)" <hlu@law.nyc. gov></hlu@law.nyc. 		[EXTERNAL] Re: freeman		Microsoft Outlook Note		Communication (email chain) regarding this litigation (related to factual investigation of FreeCo, Atlantic Dominion) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	
DMNL00241_ 000014323		11/24/2021 12:20	11/24/2021 12:20		"Lu, Hope (Law)" <hlu@law.nyc.gov ></hlu@law.nyc.gov 	Frank Brostrom <frank.brostrom@gmail.co m>; "Proshansky, Eric (Law)" <eproshan@law.nyc.gov></eproshan@law.nyc.gov></frank.brostrom@gmail.co 			RE: [EXTERNAL] Email		Microsoft Outlook Note	AWP	Communication (email chain) regarding this litigation (related to factual investigation of FreeCo) between Plaintiff's counsel and Frank Brostrom, an investigator engaged by Plaintiff to perform investigative tasks in connection with this and other litigation.	0	